

February 19, 1992
Page Two

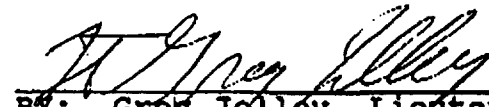
The Las Vegas Metropolitan Police Department supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet because it is a critical Law Enforcement tool to the capture of active robbery suspects in the community. It is estimated that the average robbery suspect commits at least five to seven robberies; therefore, each suspect that is taken into custody is a significant factor in the reduction of future robberies. Additionally, this system affords us the opportunity to capture suspects relatively soon after the commission of the crime where physical evidence and recovered cash is found on the suspect. This often leads to confessions and significantly higher conviction rates which further assist in keeping these suspects off the streets.

In my opinion this is the only technology ever to have this much impact on the capture of robbery suspects. This is the major reason our apprehension rate is the or among the highest in the nation.

If ETS (ProNet) is not provided permanent spectrum and is not granted a Pioneer's Preference, it is felt that the existence of this system would be in a great jeopardy if for some reason they were not permitted to use this frequency. The results of not having this system in this area, to say the least, would be detrimental to the efforts of Law Enforcement and this community.

Respectfully,

John Moran, Sheriff


By: Greg Jolley, Lieutenant
Crimes Against Person Section

GJ/sb
92R0047



CITY OF ANAHEIM, CALIFORNIA

Police Department

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MAR 2 '92

February 27, 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE
SECRETARY

Ms. Donna R. Searcy, Secretary
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street N.W., Room 222
Washington, D.C. 20036

RE: In the matter of a request by ProNet Inc. for grant of a
Pioneer's Preference for its Electronic Tracking Service

File #PP-23, RM-7784

Dear Ms. Searcy:

The Anaheim Police Department hereby submits its Comments in Support of the above referenced Request for a Pioneer's Preference filed by ProNet Inc.

As the Chief of the Anaheim Police Department, I wish to express my support in ProNet Inc.'s bid for a Pioneer's Preference grant for its Electronic Tracking System.

The Anaheim Police Department entered into a contract with ProNet in May of 1989. ProNet's Electronic Tracking System has proven to be of great assistance to us in locating and arresting fleeing bank robbers.

I am familiar with ProNet's Request and their Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service rules and we fully support this request.

The Anaheim Police Department supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet because they have a proven track record in providing innovative technology which assists us in the fight against serious crime.

Based on the Tracking System's record, it is clear that a grant of a Pioneer's Preference for permanent licensed operation of this sophisticated tracking technology will facilitate crime prevention significantly and thus will serve the public interest.

Sincerely,


JOSEPH T. MOLLOY
CHIEF OF POLICE

JTM:jn



City of Phoenix
POLICE DEPARTMENT

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FEDERAL BUREAU OF INVESTIGATION
OFFICE OF THE
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February 26, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

REFERENCE: The matter of a request by Pro-Net, Inc. for grant of a Pioneer's Preference for its Electronic Tracking Service
File #PP-23, RM-7784

Dear Ms. Searcy:

The City of Phoenix Police Department hereby submits its comments in support of the above-referenced Request for a Pioneer's Preference filed by Pro-Net, Inc.

City of Phoenix, Arizona Police Department is a major municipal police department which is experiencing an increase in major crimes, including armed robberies of financial institutions. In an effort to curb the increase in robberies and improve the likelihood of apprehensions of the perpetrators, Pro-Net, Inc. was contacted to provide electronic tracking equipment designed for this purpose.

Since the initial installation of the Pro-Net tracking service in a limited area of the Phoenix City limits in February, 1991, twelve bank robbery arrests have been directly attributed to the tracking system, and over \$32,000 has been recovered.

We are familiar with Pro-Net's request and its Petition for Rulemaking to provide permanent spectrum in the 216-220MHz band for ETS. We fully support this request and their request to operate under the Business Radio Service Rules.

The Electronic Tracking service has proven to be a beneficial, if not critical, law enforcement tool in our community. Bank robbery suspects that have previously been successful in evading detection are now susceptible to apprehension much sooner and with less hazard to citizens and law enforcement officers than ever before.

We fully support ETS' request for permanent spectrum and a Pioneer's Preference.

Sincerely,

DENNIS A. GARRETT
Police Chief

Lyle H. Rodabough
LYLE H. RODABOUGH, Captain
General Investigations Bureau

dt



The CITY of BREA Police Department

NUMBER ONE CIVIC CENTER CIRCLE
BREA, CALIFORNIA 92621

(714) 990-7625

February 21, 1992

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 "M" Street N.W., Room 222
Washington, D.C. 20036

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STAMP AND RETURN

IN THE MATTER OF A REQUEST BY PRONET INC. FOR GRANT OF A PIONEER'S
PREFERENCE FOR ITS ELECTRONIC TRACKING SYSTEM (ETS)
FILE #PP-23, RM-7784

The Brea Police Department hereby submits its comments in support of the
above-referenced request of Pioneer's Preference filed by ProNet Inc.

1 The Brea Police Department is a municipal law enforcement agency that
provides law enforcement services for both the communities of Brea, and
Yorba Linda in the northwest portion of Orange County, California. We
provide services for approximately 90,000 residences.

2 ProNet has contracted with several financial institutions in both the
cities of Brea and Yorba Linda for their Electronic Tracking System for
over two years. The Brea Police Department has been involved in several
captures of suspects of armed robberies of these institutions during that
time period. The most significant; occurring on August 27, 1991, where a
Bank of America branch was robbed at approximately 4:00 PM. With the use
of the Anaheim Police Department's helicopter and ground units from our
agency and surrounding cities, the vehicle was tracked for over 1 hour and
15 minutes, through rush hour Friday evening traffic in the Los Angeles
metropolitan basin. The vehicle was finally stopped and suspects were
arrested with complete recovery. If it had not been for ETS that date, we
believe, that this case would not have been cleared. With the use of the
electronic tracking system, we were able to follow and track the vehicle
and no innocent bystanders were injured during a high speed police pursuit.

3 We are familiar with ProNet's request and its petition for Rulemaking
to provide a permanent spectrum in the 216-220 MHz band for ETS and to
authorize ETS to operate under the business radio service rules, and we
fully support this request. We believe this will enhance our ability to
provide service to our business community, not only banking institutions,
but also jewelry stores.

Serving the Cities of BREA and YORBA LINDA

Page 2

4 The Brea Police Department supports the grant of a Pioneer's Preference and rule making to ProNet because:

- (a) We believe, it is a critical enforcement tool for law enforcement that is not currently available by any other company. It allows us to track robbery suspects and attempts to apprehend in a safer location, rather than responding directly into a crime scene and possibly having a barricade situation take place.
- (b) With the institutions in our community that have been the victims of a robberies since the installation of ETS, the apprehension rate is significantly higher than it is with institutions in our community that are not equipped with ProNet ETS.
- (c) I am unaware of another system that is available for jewelry stores or financial institutions to use that allows law enforcement to track a suspect once a robbery has occurred. To my knowledge, ProNet is the only company that provides this type of service.
- (d) If ProNet ETS is not provided a permanent spectrum, and is not granted a Pioneer's Preference, and is subsequently unable to provide this service to institutions within our community, I believe it could create the potential for more hostage situations, lower the apprehension rate of suspects and decrease the recovery rate of stolen property, along with potential for injury of innocent people during a high speed vehicle pursuit.



D. L. FORKUS, CHIEF OF POLICE
BREA POLICE DEPARTMENT

cc: Reading File
Subject File
Sergeant Gary M. Drlik



CITY OF FOUNTAIN VALLEY

POLICE DEPARTMENT

10200 SLATER AVENUE, FOUNTAIN VALLEY, CALIFORNIA 92708-8030

ELVIN G. MIALI

(714) 965-4400

CHIEF OF POLICE

February 27, 1992

Ms. Donna R. Searcy,
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

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STAMP AND RETURN

Reference: In the matter of a request by Pro Net Inc. for grant of a Pioneer's Preference for its Electronic Tracking Service.

File # PP-23, RM-7784

Dear Ms. Searcy:

The Fountain Valley Police Department hereby submits its comments in support of the above referenced request for a Pioneer's Preference filed by Pro Net Inc.

1. The Fountain Valley Police Department is a municipal police department located in Orange County, California. The service provided by Pro Net Inc., in particular, the Electronic Tracking Service has proven to be an extremely valuable tool for law enforcement in the apprehension of criminals.

Our department has been involved with Pro Net Inc., since 1989 and have been involved in the capture of several suspects that have been involved in bank robberies. We have also been able to recover the loss in some of these cases.

We are familiar with Pro Net's request and it's Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service rules and that we fully support this request.

The Fountain Valley Police Department supports the grant of a Pioneer's Preference, and Rulemaking to Pro Net because:

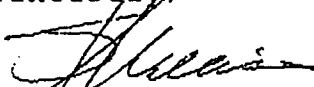
D.A.R.E.
TO KEEP KIDS OFF DRUGS.

It is a critical law enforcement tool in the apprehension of criminals and the recovery of property. It has also allowed law enforcement the ability to not only apprehend suspects and recover property, but to substantially increase our conviction rate.

This system is unique in that it is the one of it's type which allows law enforcement to effectively track and apprehend suspects immediately after a crime has been committed. Thus allowing us to recover victims property before the suspect has had the time to dispose of it.

The loss of this valuable tool would be a great loss to law enforcement in the Southern California area. Due to our population, and access to freeway systems, a suspect has the ability to rapidly escape. This system affords us the jump we need to apprehend suspects, recover property and convict the guilty parties.

Sincerely,



Detective Steve Williams
Fountain Valley Police Department
Robbery/Homicide Division

SACRAMENTO COUNTY



SHERIFF'S DEPARTMENT

Glen Craig
Sheriff

February 24, 1992

FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF THE
SECRETARY

MAR 2 1992

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Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

REFERENCE: Request by PRONET, INC., for grant of a Pioneer's Preference for its Electronic Tracking Service

FILE: #PP-23,RM7784

Dear Ms. Searcy,

The Sacramento County Sheriff's Department hereby submits its positive comments in support of ProNet's Electronic Tracking Service and their request for a Pioneer's Preference filed by ProNet, Inc.

As a California public law enforcement agency, we do not endorse any specific or particular product. However, the Sacramento Sheriff's Department has utilized ProNet's Electronic Tracking System, with positive results, enabling numerous cases to be cleared and solved which would have been difficult otherwise.

Since 1985, the Sacramento County Sheriff's Department has contracted with ProNet, Inc. During this time, ProNet, Inc., has provided equipment, maintenance and repairs, as well as training for departmental personnel who utilize the system. The ProNet Electronic Tracking System has substantially increased the capture rate of numerous felons and career criminals; as well as recover an unsurmountable amount of victim's property.

The Sacramento Sheriff's Department is familiar with ProNet's request and its petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service rules and we fully support this request.

The Pioneer's Preference (and Rulemaking) grant to ProNet, Inc., is supported by the Sacramento County Sheriff's Department for the following reasons:

The E.T.S. System is utilized by the Sacramento Sheriff's Department for pro active enforcement in the area of business burglaries, vehicle burglaries and most importantly bank robberies. Robberies always involve human victims, and the E.T.S. System allows for the suspect to leave the scene without confronting employees or being forced into hostage situations.


The Electronic Tracking System has provided the Sacramento Sheriff's Department with an overall capture rate of 74%, which includes all of its present applications (1991 Statistical information).

Ms. Donna R. Searcy, Secretary
February 24, 1992
Page Two

The innovative technology involved with the Electronic Tracking System has been imperative to the success of the Sacramento County Sheriff's Department with regard for protecting lives, and apprehending criminals throughout Sacramento County.

Sincerely,

GLEN CRAIG, SHERIFF



Karen Goesch,
Sheriff's E.T.S. Coordinator
Sacramento County Sheriff's Dept.

KG:mah



POLICE DEPARTMENT
CITY AND COUNTY OF SAN FRANCISCO
HALL OF JUSTICE
850 BRYANT STREET
SAN FRANCISCO, CALIFORNIA 94103

WILLIS A. CASEY
CHIEF OF POLICE

February 19, 1992

"STAMP AND RETURN"

FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF THE
SECRETARY

MAR 2 '92

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Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20036

Re: **Request by PRONET, Inc. for Grant of a Pioneer's
Preference for its Electronic Tracking Service**

Dear Ms. Searcy:

The Robbery Apprehension Team (R.A.T.) of the San Francisco Police Department hereby submits its comments in support of the above referenced request for a Pioneer's preference filed by PRONET, Inc.

I am the Coordinator of the Robbery Apprehension Team, and have been so, for over six years. The team works on bank robbers and have been a team since 1981. At any given time, the team responds to 1 or 2 bank robberies a day. We are interested in the grant since the system has helped us keep the bank robbery rate down. Before the system came to our city, the rate of robbery were going over 300 for the year and at that time, banks were only open Monday to Friday, 10:00 am to 3:00 pm. The banks here are now open everyday, from 7:00 to 7:00 pm. Last year, we had 158 for the year and as of this letter, we have had 4 bank robberies for the year. This leaves our team cars to work on other crimes (32 cars).

We have had a good relationship with PRONET, since they took over the system from Texas Instruments. We are also working together to improve the system and to use it for other types of crimes: kidnapping, auto boosting, extortion, etc. Just on one case alone, we were able to recover \$64,000.00 taken from a bank in just 30 minutes. As of this date, we have made almost 250 captures, with 100% conviction rate.

We are familiar with PRONET's request and its petition for rule making to provide permanent spectrum in the 216-220 mhz band for E.T.S., and authorize E.T.S. to operate under the business radio service rules and that we fully support this request.

The Robbery Apprehension Team of the San Francisco Police Department supports the grant of a Pioneer's preference (and rule making) to PRONET because of the following reasons:

1. The system is a critical law enforcement tool that works 24 hours a day, providing a service to the public, enabling the Police Department to make arrest away from the bank or business, less endangering the public as well.

To: Ms. Donna R. Searcy
From: Officer Richard Alves
Subject: Request by PRONET, Inc. for Grant...

February 19, 1992
Page 2 of 2

2. I believe that due to the large amount of arrests the second half of the year, we are seeing a very low rate of robberies this year.
3. We think that the technology is unique, innovative and are still finding new application for its use.
4. The impact of the team would be putting us back to the dark ages, if PRONET was unable to provide us with the tools that they now provide.

Sincerely,



OFFICER RICHARD G. ALVES

Coordinator

Robbery Apprehension Team (R.A.T.)

San Francisco Police Department

RGA/adc

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MAR 2 '92

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STAMP



CITY OF SAN CLEMENTE

POLICE DEPARTMENT
ALBERT C. EHLOW, POLICE CHIEF

February 20, 1992

Ms. Donna R. Scarcy - Secretary
Federal Communications Commission
1919 M. Street, NW Room 222
Washington, DC 20036

REF: In the matter of a request by ProNet, Inc. for grant of a Pioneer's Preference for its Electronic Tracking Service. FILE# PP-23, ROOM-7784

Dear Ms. Scarcy,

The San Clemente Police Department hereby submits its comments in support of the above referenced request for a Pioneer's Preference filed by ProNet, Inc.

The San Clemente Police Department is the primary law enforcement agency for a city of 42,000 people, located on the pacific coastline of California, halfway between Los Angeles and San Diego. The Department has been in existence for over 60 years and presently has a total of 72 full-time employees.


For the past two years, as the Communications Chairman for the Orange County Police Chief's and Sheriff's Association, I have been in contact via mail, telephone and in person with both the President, Mr. David Vucina and Vice President, Mr. Larry Joy. We have dealt with keeping a vital tool for law enforcement to remain here in Orange County. In 1990 the County, through the use of the electronic tracking system, accounted for 15 bank robbery arrests and 5 arrests for jewelry store robberies. In 1990, there was a total recovery of \$1.2 million. In 1991, we saw 20 bank robbers arrested and 3 jewelry store bandits arrested. In 1991, there was a total recovery of \$773,000.00.

As a Police Chief, I am familiar with ProNet's request and fully support its petition for rule making to provide permanent spectrum in the 216-220 MHZ Band for ETS, and to authorize ETS to operate under the business radio service rules. We certainly do not want other radio traffic or similar systems to operate too close to the ETS Band. This Band needs to be kept clear and concise so that we can continue to capture these robbery suspects.

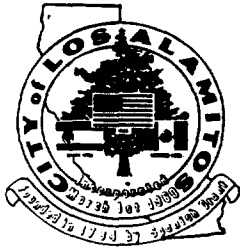
The San Clemente Police Department supports the grant of a Pioneer's Preference (and rulemaking) to ProNet because:

- a. It is a critical law enforcement tool to enable us to capture career criminals and place them in prison.
- b. The system will eventually pay for itself and will increase apprehensions and drive up our conviction rates.
- c. This tool is by far the best one we have in Orange County, to assist us in the capture of bank robbers. According to the Orange County Register Newspaper of February 18, 1992, the Federal Bureau of Investigations lists Orange County as third in the Nation for total number of bank robberies in 1991. Statistics show Orange County with 392, to be below only the cities of Los Angeles and New York City respectfully.
- d. If the ETS is not provided permanent spectrum and is not granted a Pioneer's Preference as previously stated, it will greatly hamper our ability for apprehension and conviction of career criminals.

Sincerely,


Albert C. Ehlow
CHIEF OF POLICE

ACE:ljh



CITY OF LOS ALAMITOS

POLICE DEPARTMENT

February 19, 1992

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Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20036

Reference: In the matter of a request by ProNet Inc. for grant of a
Pioneer's Preference for its Electronic Tracking Service

File #: PP-23, RM-7784

Dear Ms. Searcy:

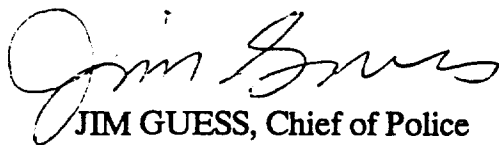
Los Alamitos Police Department hereby submits its comments in support of the above referenced Request for a Pioneer's Preference filed by ProNet, Inc.

1. I represent the Los Alamitos Police Department, one of Orange County's smaller police agencies.
2. The Los Alamitos Police Department was one of the first Orange County law enforcement agencies to receive the Electronic Tracking System (ETS) currently produced by ProNet. To the best of my knowledge, we were also the first agency in Orange County to make an arrest after a robbery and activation.
3. I am familiar with ProNet's request and its petition for rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service Rules and that we fully support this request.

4. The Los Alamitos Police Department supports the grant of a Pioneer's Preference (and rulemaking) to ProNet because:
- a. It has been proven to be a very effective law enforcement tool.
 - b. Although we do not have any current arrest statistics, we know from contacts with other Orange County and nearby Los Angeles County law enforcement agencies that the ETS System is considered very effective in both deterring the crime of robbery and enhancing the arrest of the perpetrators.
 - c. We consider ETS to be a unique and innovative technology and are not aware of anything comparable on the market as of yet.
 - d. We would hope that ETS is provided a permanent spectrum and is granted a Pioneer's Preference. This will encourage other technological development in other public arenas if pioneers can truly be rewarded for their original efforts in fields that quickly get copied.

Sincerely,

LOS ALAMITOS POLICE DEPARTMENT



JIM GUESS, Chief of Police

JG/mw



Bob Lanier, Mayor

CITY OF HOUSTON

Houston Police Department

61 Riesner Street Houston, Texas 77002 713/247-1000

CITY COUNCIL MEMBERS: Helen Huey Ernest McGowen, Sr. Vince Ryan Judson W. Robinson, III Frank O. Mancuso Dale M. Gorczynski Christin Hartung
John G. Goodner Ben T. Reyes Gracie Guzman Saenz Eleanor Tinsley Jim Greenwood Sheila Jackson Lee Alfred J. Calloway CITY CONTROLLER: George Greania

Elizabeth M. Watson
Chief of Police



Ms Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

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SECRETARY

Reference: In the matter of a request by ProNet Inc. for grant
a Pioneer's Preference for its Electronic Tracking
Service.

File# PP-23, RM-7784

Dear Ms Searcy;

The Houston Police Department hereby submits its comments in support of the above referenced Request for a Pioneer's Preference filed by ProNet Inc.

The City of Houston, Texas, Police Department is experiencing a cooperative working relationship with ProNet Inc. in the operation of their "Electronic Tracking System". A system that ProNet Inc. installed and maintains in the City of Houston, Texas. The design and purpose of this system is to aid law enforcement agencies in the apprehension of robbery suspects immediately following the commission of their crimes.

ProNet's Electronic Tracking System went on line in Houston on July 1st, 1990. Since that time the system has been instrumental in the apprehension of twelve individuals, the clearance of twenty six felony crimes, and the recovery of over \$46,000 in stolen money.



The Houston Police Department is familiar with ProNet's Request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for E.T.S., and to authorize E.T.S. to operate under the Business Radio Service rules and that we fully support this request.

The Houston Police Department supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet, because the E.T.S. system is a vital tool to this department. The ProNet system provides the City of Houston with a "high tech" crime fighting aid, at minimal cost, that the city might not otherwise be able to obtain on its own. If ProNet is not granted this Pioneer's Preference it could have a negative impact on this department's ability to combat our ever increasing incidence of violent crime.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve M. Ruteshouser", written in a cursive style.

Steven M. Ruteshouser, Sergeant
Houston Police Dept.
Robbery Division
61 Riesner St.
Houston, Tx. 77002

SMR/smr



POLICE DEPARTMENT

237 WEST COMMONWEALTH AVE. • FULLERTON, CA 92632 • (714) 738-6800 • FAX (714) 773-1043

PHILIP A. GOEHRING CHIEF OF POLICE

February 20, 1992

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SECRETARY
REFERENCE TO

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

Reference: In the matter of a request by ProNet Inc. for grant of a Pioneer's Preference for its Electronic Tracking Service.

File # PP-23, RM-7784

Dear Ms Searcy:

As Chief of Police for the City of Fullerton I hereby submit these comments in support of the above reference request for a Pioneer's Preference filed by ProNet Inc.

The Fullerton Police Department is a municipal police agency serving a population of 115,000 citizens in the fifth largest county in the United States. We have had a relationship with ProNet in the form of the Electronic Tracking Service in local banks since February 1990.

Since its inception we have apprehended only one bank robbery suspect who robbed a Fullerton bank by means of the ETS methodology. However, we are in a metropolitan area of approximately 2 million citizens and have on numerous occasions apprehended or assisted in the apprehension of bank robbery suspects from other jurisdictions similarly equipped with ETS.

I am familiar with ProNet's request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHZ band for ETS, and to authorize ETS to operate under the Business Radio Service rules and that we fully support this request.

The Fullerton Police Department supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet because:

- a. ETS has proven to be a valid law enforcement tool in the apprehension of armed and dangerous criminals within minutes after the completion of a crime.

- b. This technology has been our first experience with an electronic means of locating criminals fleeing the scene of a crime and has been very effective in its application.
- c. If ProNet were to be denied the Pioneer's Preference it would certainly remove a valuable and effective tool we now enjoy in the apprehension of dangerous criminals.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Philip A. Goehring", with a stylized flourish at the end.

PHILIP A. GOEHRING
Chief of Police



CITY OF DALLAS

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MAR. 2 '92
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE
SECRETARY

February 28, 1992

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M. Street NW, Room #222
Washington, D.C. 20036

REFERENCE: IN THE MATTER OF A REQUEST BY PRONET INC. FOR GRANT OF A
PIONEER'S PREFERENCE FOR ITS ELECTRONIC TRACKING SERVICE

FILE #PP-23, RM-7784

Dear Ms. Searcy:

The Dallas Police Department wishes to voice its support of the petition submitted by Pro Net Inc. for the permanent provision of an Electronic Tracking Services (ETS) within the rules and provisions of the FCC. The Dallas Police Department as well as the Metroplex surrounding Dallas needs the technology that the Tracking system provides. This vital law enforcement monitoring and tracking service enables us to promote safety of life and property through the expanded use of radio communications for crime control and prevention.

We became involved with ETS and the Electronic Tracking System in August 1987 and found it to be a valuable tool in law enforcement. Specifically, our organization has had experience with ETS in the area of financial institution robberies, where the Electronic Tracking System has resulted in the apprehension and subsequent conviction of the felony robbery suspect, under circumstances that typically would result in the robber getting away.

The Dallas Police Department is aware of Pronet's Request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service rules and we fully support this request.

The Electronic Tracking System allows the user police departments the advantage of making the arrest away from the location of the offense. This has led to increased personal safety for financial institution customers and employees, police officers, and the citizens of our community.

A specific case where the Electronic Tracking System was particularly useful to us was the arrest of Mark Reeves aka: "The Dapper Bandit" who had been robbing banks in Texas for nine (9) years. In addition, in 1991 we recovered over \$196,000.00 taken from financial institutions that would not have been recovered without ETS.

Page Two (2)
February 28, 1992
Secretary
Federal Communications Commission
1919 M. Street NW, Room #222
Washington, D.C. 20036

The Dallas Police Department supports the granting of a Pioneer's Preference (and Rulemaking) to ProNet Inc.

If you need additional information from me, do not hesitate to call. The liaison officer for the Dallas Police Department for this project is Sergeant James W. Andrews, phone 214-670-5146.

Sincerely,

WILLIAM M. RATHBURN
CHIEF OF POLICE

A handwritten signature in cursive script, appearing to read "Ron Waldrop".

R.E. Waldrop
Acting Bureau Commander
Crimes Against Persons Bureau

JWA:ma

0003M



The CITY of BREA Police Department

NUMBER ONE CIVIC CENTER CIRCLE
BREA, CALIFORNIA 92621

(714) 990-7625

February 21, 1992

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 "M" Street N.W., Room 222
Washington, D.C. 20036

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IN THE MATTER OF A REQUEST BY PRONET INC. FOR GRANT OF A PIONEER'S
PREFERENCE FOR ITS ELECTRONIC TRACKING SYSTEM (ETS)
FILE #PP-23, RM-7784

The Brea Police Department hereby submits its comments in support of the
above-referenced request of Pioneer's Preference filed by ProNet Inc.

1 The Brea Police Department is a municipal law enforcement agency that
provides law enforcement services for both the communities of Brea, and
Yorba Linda in the northwest portion of Orange County, California. We
provide services for approximately 90,000 residences.

2 ProNet has contracted with several financial institutions in both the
cities of Brea and Yorba Linda for their Electronic Tracking System for
over two years. The Brea Police Department has been involved in several
captures of suspects of armed robberies of these institutions during that
time period. The most significant; occurring on August 27, 1991, where a
Bank of America branch was robbed at approximately 4:00 PM. With the use
of the Anaheim Police Department's helicopter and ground units from our
agency and surrounding cities, the vehicle was tracked for over 1 hour and
15 minutes, through rush hour Friday evening traffic in the Los Angeles
metropolitan basin. The vehicle was finally stopped and suspects were
arrested with complete recovery. If it had not been for ETS that date, we
believe, that this case would not have been cleared. With the use of the
electronic tracking system, we were able to follow and track the vehicle
and no innocent bystanders were injured during a high speed police pursuit.

3 We are familiar with ProNet's request and its petition for Rulemaking
to provide a permanent spectrum in the 216-220 MHz band for ETS and to
authorize ETS to operate under the business radio service rules, and we
fully support this request. We believe this will enhance our ability to
provide service to our business community, not only banking institutions,
but also jewelry stores.

Serving the Cities of BREA and YORBA LINDA

Page 2

4 The Brea Police Department supports the grant of a Pioneer's Preference and rule making to ProNet because:

- (a) We believe, it is a critical enforcement tool for law enforcement that is not currently available by any other company. It allows us to track robbery suspects and attempts to apprehend in a safer location, rather than responding directly into a crime scene and possibly having a barricade situation take place.
- (b) With the institutions in our community that have been the victims of a robberies since the installation of ETS, the apprehension rate is significantly higher than it is with institutions in our community that are not equipped with ProNet ETS.
- (c) I am unaware of another system that is available for jewelry stores or financial institutions to use that allows law enforcement to track a suspect once a robbery has occurred. To my knowledge, ProNet is the only company that provides this type of service.
- (d) If ProNet ETS is not provided a permanent spectrum, and is not granted a Pioneer's Preference, and is subsequently unable to provide this service to institutions within our community, I believe it could create the potential for more hostage situations, lower the apprehension rate of suspects and decrease the recovery rate of stolen property, along with potential for injury of innocent people during a high speed vehicle pursuit.



D. L. FORKUS, CHIEF OF POLICE
BREA POLICE DEPARTMENT

cc: Reading File
Subject File
Sergeant Gary M. Drlik

CITY OF BUENA PARK



C A L I F O R N I A 9 0 6 2 2

6650 BEACH BOULEVARD, P.O. BOX 5009, PHONE: AREA CODE (714) 521-9900

RICHARD M. TEFANK
Chief of Police
February 10, 1990

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

"STAMP AND

RECEIVED
MAR 23 1990
FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF THE
SECRETARY

REFERENCE: In the matter of a request by ProNet Inc. for grant
of a Pioneer's Preference for its Electronic
Tracking Service

File #PP-23, RM-7784

Dear Ms. Searcy:

The Buena Park Police Department hereby submits its comments in support of the above referenced Request for a Pioneer's Preference filed by ProNet Inc.

1. The Buena Park Police Department is located in Orange County. As the law enforcement agency for the City of Buena Park, we are interested in providing our citizens and businesses the highest quality law enforcement service.
2. Since August 23, 1989, ProNet has provided all law enforcement agencies in Orange County with the Electronic Tracking System (ETC) to assist in the location and apprehension of armed robbery suspects. This system has been highly successful and resulted in arrest of two armed robbery suspects in our community alone.
3. I am familiar with ProNet's request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for the Electronic Tracking System (ETS) and to authorize the Electronic Tracking System (ETS) to operate under the Business Radio Service rules and that I fully support that request.
4. The Buena Park Police Department supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet because:
 - a. This is a critical tool for law enforcement since it assists in the apprehension of dangerous armed robbery suspects and recovery of victims' property.

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
February 20, 1992 Page #2

- b. Without the Electronic Tracking System two armed robbery suspects would not have been apprehended in Buena Park and convicted. This system has been highly accepted and valued by our personnel.
- c. This technology is unique and effective because it allows law enforcement to track and locate a suspect without the suspect's knowledge and is safe for the general public. Within Orange County it allows all law enforcement agencies to work together to track and locate the suspect in a coordinated effort.
- d. The Buena Park Police Department will lose a significant law enforcement tool if the Electronic Tracking System is not provided permanent spectrum and is not granted a Pioneer's Preference.

Sincerely,



RICHARD M. TEFANK
Chief of Police

RMT/dr



POLICE DEPARTMENT

Post Office Box 144 Addison, Texas 75001

(214) 450-7100

February 26, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF THE
SECRETARY

MAR 2 '92

RECEIVED

REFERENCE: In the matter of a request by ProNet, Inc.
for a grant of its Electronic Tracking Service

File #PP-23,RM-7784

Dear Ms. Searcy:

The Addison Police Department, Addison, Texas, hereby submits its comments in support of the above reference request for a Pioneer's Preference filed by ProNet, Inc.

As a municipal law enforcement agency, we are constantly searching for new, innovative and effective methods which will enable us to better apprehend and deter the lawless members of our society. In January, 1987, the Addison Police Department became convinced that the electronic tracking system, which is provided by ProNet, Inc., would help us in a significant way to accomplish this goal.

Since our relationship with their electronic tracking system, ProNet, Inc. has provided the equipment and technical support required to make such a complex system function in the proper manner. In so doing, it has enabled our department to apprehend the offenders in numerous offenses and has allowed us to recover a significant amount of property, from radar detectors to automobiles. We have not lost a prosecution yet.

The Electronic Tracking Service offered by ProNet, Inc. has become an invaluable law enforcement tool for not only the Town of Addison, but for the entire Dallas area. We have yet to locate a better tracking system for the environment in which it is being utilized.

We are aware of ProNet's request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for their Electronic Tracking System to operate under the Business Radio Service rules, and we fully support this request.

Should ProNet, Inc. not be granted a Pioneer's Preference, it would have a tremendous adverse effect on our efforts to apprehend and prosecute many of those who prey on our society.

Sincerely,

JAMES McLAUGHLIN, JR.
CHIEF OF POLICE

Gary L. Taylor

Gary L. Taylor
Electronic Tracking System Coordinator
Addison Police Department

GLT:rs

Mayor

JOHN O. TYNES

City Administrator

ROBERT D'AMATO

Councilmembers

CAROL DOWNEY

NORMAN Z. ECKENRODE

MARIA MORENO

ARTHUR G. NEWTON

The People are the City



Police Chief

MANUEL ORTEGA

Administrative Captain

JAMES ROBERTSON

Patrol Captain

DARYLL THOMANN

Police Department

(714) 993-8164

401 East Chapman Avenue - Placentia, California 92670

March 9, 1992

**Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, DC 20036**

**Reference: In the matter of the request by Pro Net Inc.
for grant of a Pioneer's Preference for its
Electronic Tracking Service**

File #PP-23, RM-7784

Dear Ms. Searcy,

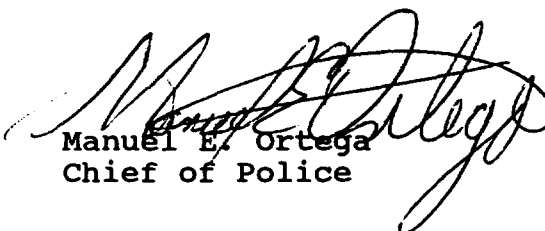
On behalf of the Placentia Police Department I am submitting my comments in support of the above referenced request for a Pioneer's Preference filed by Pro Net Inc. We have been involved with Pro Net Inc. for the past two and a half years. In that time we have seen the proven effects of Pro Net's product and service. Over 90% of the bank robberies that have occurred in our city where Pro Net was installed have resulted in the capture of the suspect(s) and return of the money to the financial institution. Only one time have we had a bank robber defeat the Pro Net system, and that was by bending over a pack of money that had a Pro Net transmitter hidden in it and breaking the antenna. Even then the bank robber had no idea that he had taken a transmitter pack.

I am familiar with Pro Net's request and its Petition for Rulemaking to provide permanent spectrum in the 216-22 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service rules and we fully support this request.

In the past two and half years Pro Net has proved to us that they have a very effective tool that has greatly assisted law

enforcement not only in our city but in our County. In this day and age when some companies are manufacturing products to help defeat law enforcements efforts, Pro Net has offered us a product and a service to help make our job a little easier.

We would respectfully request the FCC to grant to Pro Net a Pioneer's Preference for its Electronic Tracking Service.



Manuel E. Ortega
Chief of Police

MEO/mr



CITY OF HUNTINGTON BEACH

2000 MAIN STREET
P.O. BOX 70

POLICE DEPARTMENT

CALIFORNIA 92648

Tel: (714) 960-8811

RONALD E. LOWENBERG
Chief of Police

February 20, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

Reference: In the matter of a request by ProNet Inc. for
grant for a Pioneer's Preference for its
Electronic Tracking Service

File # PP-23, RM-7784

Dear Ms. Searcy:

The Huntington Beach Police Department hereby submits its
comments in support of the above referenced request for a
Pioneers Preference filed by ProNet Inc.

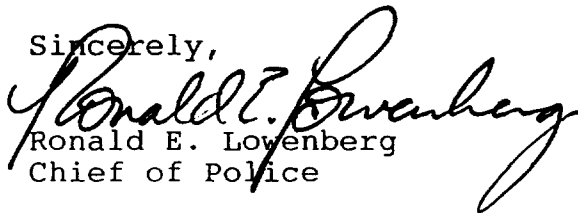
1. The Huntington Beach Police Department provides law enforcement services for a southern California city of 182,000 persons and a summer time population that can sometimes be triple that figure. The police department utilizes the Electronic Tracking System and is interested in maintaining and retaining this crime fighting tool.
2. The Huntington Beach Police Department has been utilizing the Electronic Tracking System since 1989. During this time, use of the system has resulted in the tracking and capture of several robbery suspects who were fleeing from crimes they had just committed. These timely captures also allowed for the recovery of the property that had been stolen.
3. The Huntington Beach Police Department is familiar with ProNet's request and its petition for rulemaking to provide permanent spectrum in the 216-220 MHz band for

ETS, and to authorize ETS to operate under the Business Radio Service rules. We fully support this request.

The Huntington Beach Police Department supports the grant of a pioneer's preference to ProNet because it offers a unique crime fighting tool that is unavailable through any other media. In the situations cited above, these arrests would have been impossible without a system such as ETS because of incomplete descriptions of vehicles and suspects as well as a specific direction of travel. The ETS system allows police officers to capture a signal and track it to a point of arrest. Because suspects are captured shortly after the crime is committed and with the stolen property in their possession, subsequent prosecution is enhanced and almost a certainty.

Although firm supportive data is unavailable, we have reason to believe the system has become a deterrent to some crimes, particularly institutional robbery, and we have found that perpetrators are now looking for signs of a signaling device when they commit such crimes. If the failure to grant ETS a permanent spectrum results in some change or loss of that service, our agency, the community and law enforcement in general will have lost a unique and effective crime fighting tool.

Sincerely,


Ronald E. Lowenberg
Chief of Police

RL/ms



CITY OF ANAHEIM, CALIFORNIA

Police Department

February 27, 1992

Ms. Donna R. Searcy, Secretary
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street N.W., Room 222
Washington, D.C. 20036

RE: In the matter of a request by ProNet Inc. for grant of a
Pioneer's Preference for its Electronic Tracking Service

File #PP-23, RM-7784

Dear Ms. Searcy:

The Anaheim Police Department hereby submits its Comments in Support of the above referenced Request for a Pioneer's Preference filed by ProNet Inc.

As the Chief of the Anaheim Police Department, I wish to express my support in ProNet Inc.'s bid for a Pioneer's Preference grant for its Electronic Tracking System.

The Anaheim Police Department entered into a contract with ProNet in May of 1989. ProNet's Electronic Tracking System has proven to be of great assistance to us in locating and arresting fleeing bank robbers.

I am familiar with ProNet's Request and their Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service rules and we fully support this request.

The Anaheim Police Department supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet because they have a proven track record in providing innovative technology which assists us in the fight against serious crime.

Based on the Tracking System's record, it is clear that a grant of a Pioneer's Preference for permanent licensed operation of this sophisticated tracking technology will facilitate crime prevention significantly and thus will serve the public interest.

Sincerely,


JOSEPH T. MOLLOY
CHIEF OF POLICE

JTM:jn



JOHN MORAN, SHERIFF

February 19, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, DC 20036

REFERENCE: In the matter of a request by ProNet Inc. for grant of a Pioneer's Preference for its Electronic Tracking Service.

File #PP-23, RM-7784

Dear Ms. Searcy:

Las Vegas Metropolitan Police Department hereby submits its comments in support of the above reference Request for a Pioneer's Preference filed by ProNet Inc.

I have been assigned to the Robbery Detail of the Detective Bureau for over three and one half years. This department has utilized the ProNet tracking system since 1984. This Department and its community would support the request by ProNet for a grant for a Pioneer's Preference since this system has greatly contributed to the arrest of many bank robbers in this area.

ProNet has demonstrated continued professionalism in providing what I believe to be the most productive security system available to the banking industry. Each year our apprehension rate approaches or exceeds the 90% mark and this is due largely to the ProNet system. Additionally, with these apprehensions, monetary recovery is in the tens of thousands of dollars.

This Department is familiar with ProNet's request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS and to authorize ETS to operate under the Business Radio Service rules and that we fully support this request.



February 19, 1992
Page Two

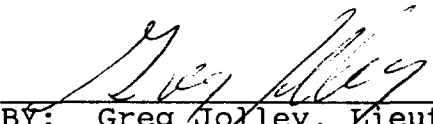
The Las Vegas Metropolitan Police Department supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet because it is a critical Law Enforcement tool to the capture of active robbery suspects in the community. It is estimated that the average robbery suspect commits at least five to seven robberies; therefore, each suspect that is taken into custody is a significant factor in the reduction of future robberies. Additionally, this system affords us the opportunity to capture suspects relatively soon after the commission of the crime where physical evidence and recovered cash is found on the suspect. This often leads to confessions and significantly higher conviction rates which further assist in keeping these suspects off the streets.

In my opinion this is the only technology ever to have this much impact on the capture of robbery suspects. This is the major reason our apprehension rate is the or among the highest in the nation.

If ETS (ProNet) is not provided permanent spectrum and is not granted a Pioneer's Preference, it is felt that the existence of this system would be in a great jeopardy if for some reason they were not permitted to use this frequency. The results of not having this system in this area, to say the least, would be detrimental to the efforts of Law Enforcement and this community.

Respectfully,

John Moran, Sheriff


BY: Greg Jolley, Lieutenant
Crimes Against Person Section

GJ/sb
92R0047



City of Phoenix

POLICE DEPARTMENT

February 26, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

REFERENCE: The matter of a request by Pro-Net, Inc. for grant of a Pioneer's Preference for its Electronic Tracking Service
File #PP-23, RM-7784

Dear Ms. Searcy:

The City of Phoenix Police Department hereby submits its comments in support of the above-referenced Request for a Pioneer's Preference filed by Pro-Net, Inc.

The City of Phoenix, Arizona Police Department is a major municipal police department which is experiencing an increase in major crimes, including armed robberies of financial institutions. In an effort to curb the increase in robberies and improve the likelihood of apprehensions of the perpetrators, Pro-Net, Inc. was contacted to provide electronic tracking equipment designed for this purpose.

Since the initial installation of the Pro-Net tracking service in a limited area of the Phoenix City limits in February, 1991, twelve bank robbery arrests have been directly attributed to the tracking system, and over \$32,000 has been recovered.

We are familiar with Pro-Net's request and its Petition for Rulemaking to provide permanent spectrum in the 216-220MHz band for ETS. We fully support this request and their request to operate under the Business Radio Service Rules.

The Electronic Tracking service has proven to be a beneficial, if not critical, law enforcement tool in our community. Bank robbery suspects that have previously been successful in evading detection are now susceptible to apprehension much sooner and with less hazard to citizens and law enforcement officers than ever before.

We fully support ETS' request for permanent spectrum and a Pioneer's Preference.

Sincerely,

DENNIS A. GARRETT
Police Chief

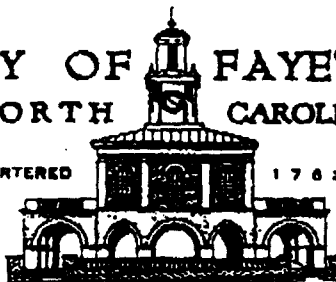
Lyle H. Rodabaugh
L. RODABOUGH, Captain
General Investigations Bureau

dt

THE CITY OF FAYETTEVILLE NORTH CAROLINA

CHARTERED

1782



OFFICE OF THE CHIEF OF POLICE
SUITE 124, 131 DICK STREET

28 February 1992

FAYETTEVILLE, N. C. 28301-5798
TELEPHONE: (919) 433-1819

MISSION STATEMENT

"PERFORM OUR DUTIES AND UPHOLD OUR RESPONSIBILITIES OF PROTECTING THE CIVIL RIGHTS AND FREEDOMS AND PROVIDING POLICE SERVICES TO THE CITIZENS OF FAYETTEVILLE, NORTH CAROLINA. WE WILL DO THIS BY BEING PROACTIVE IN OUR APPROACH TO OUR DUTIES AND BY BEING AWARE OF THE NEEDS OF THE COMMUNITY AND THE NEEDS OF THE CITIZENS OF FAYETTEVILLE."

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE
SECRETARY

MAR 2 1992

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Ms. Donna R. Searcy
Secretary
Federal Communication Commission
1919 M. Street N.W., Room 222
Washington, D.C. 20036

RE: In the matter of a request by ProNet, Inc. for grant
of a Pioneer's Preference for its Electronic
Tracking System--File #PP-23, RM-7784

Dear Ms. Searcy:

The Fayetteville Police Department hereby submits its
comments in support of the above referenced request for a
Pioneer's Preference filed by ProNet, Inc.

Our City is interested in obtaining the services provided
by ProNet, Inc. Obviously we need the support of the Federal
Communications Commission for ProNet to be able to provide the
needed services which are critical to law enforcement.

Thank you for your support in this matter.

Sincerely,

RONALD E. HANSEN
Chief of Police

REH:lof

122nd NATIONALLY ACCREDITED



LAW ENFORCEMENT AGENCY

An Equal Opportunity Affirmative Action Employer

MAYOR

Dan Young,
MAYOR PRO TEM
Miguel A. Pulido
COUNCILMEMBERS
John Acosta
Daniel E. Griset
Patricia A. McGuigan
Rick Norton
Robert L. Richardson



CITY OF SANTA ANA

POLICE DEPARTMENT
24 CIVIC CENTER PLAZA • P.O. BOX 1981
SANTA ANA, CALIFORNIA 92702

ALL-AMERICA CITY 1982

CITY MANAGER
David N. Ream
CITY ATTORNEY
Edward J. Cooper
CLERK OF THE COUNCIL
Janice C. Guy

FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF THE
SECRETARY

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February 20, 1992

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

REFERENCE: In the matter of a request by ProNet Inc. for grant of a
Pioneer's Preference for its Electronic Tracking Service

File #PP-23, RM-7784

Dear Ms. Searcy:

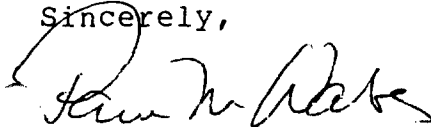
The Santa Ana Police Department hereby submits its comments in support of the above referenced Request for a Pioneer's Preference filed by ProNet Inc.

The Santa Ana Police Department has been utilizing the ProNet Electronic Tracking System technology for the past three years. During this time, several significant apprehensions have been accomplished which were directly related to the ETS system.

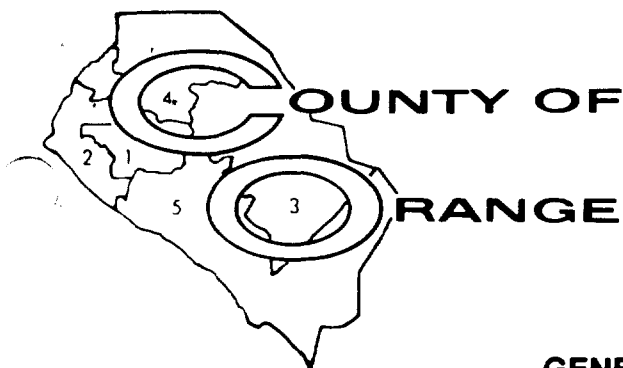
We have been made aware of ProNet's request and its petition for rule-making to provide permanent spectrum in the 216-220 MHz band for ETS, and authorization to operate under the Business Radio Service rules. We at the Santa Ana Police Department fully support ProNet's effort to secure approval of said request.

The Santa Ana Police Department supports ProNet's efforts to secure Pioneer's Preference in order to continue with its innovative ETS technology. The ETS system has proved to be a critical tool within the law enforcement community and the loss of such an asset would certainly be a disservice to the law enforcement community and the public we serve.

Sincerely,


PAUL M. WALTERS
Chief of Police

/it



**GENERAL SERVICES AGENCY
COMMUNICATIONS DIVISION**

February 24, 1992

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

REFERENCE: In the matter of a request by ProNet Inc. for grant
of a Pioneer's Preference for its Electronic
Tracking Service - File #PP-23, RM-7784

Dear Ms. Searcy:

The County of Orange, GSA/Communications Division hereby submits its Comments in support of the above referenced Request for a Pioneer's Preference filed by ProNet Inc.

1. The County of Orange, GSA/Communications Division provides Communications coordination and services to all public safety agencies in Orange County, California.
2. We are the coordinating agency when a ProNet Tracking System activation occurs. In 1991, this county experienced twelve successful activations where suspects were taken into custody as a direct result of the ProNet Tracking System.
3. We are familiar with ProNet's Request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service rules. The County of Orange, GSA/Communications Division fully supports this request.
4. We support the grant of a Pioneer's Preference (and Rulemaking) to ProNet because the Orange County Chiefs of Police and Sheriffs Association feels this is a critical law enforcement tool, and supports this system. The Electronic Tracking System, using innovative technology, has proven to be successful in apprehending crime suspects and the return of money and merchandise to the owner.

Sincerely,

Robert C. Jones, Manager
GSA/Communications Division

R. A. SCOTT
Director, General Services Agency

ROBERT G. LOVE
Deputy Director, General Services Agency

JACQUELINE K. HENDERSON
Director of Information Systems

ROBERT C. JONES
Manager, GSA/Communications Division

ADMINISTRATION ENGINEERING & MAINTENANCE
1985 South Santa Cruz Street
Anaheim, CA 92805-6815
(714) 938-4300 FAX (714) 938-4396

COUNTY COORDINATED COMMUNICATIONS CENTER
481 The City Drive South
Orange, CA 92668 3303
(714) 834-7167 FAX (714) 937-0375

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SECRETARY

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February 20, 1992

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

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FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF THE
SECRETARY

Re: In the matter of a request by ProNet, Inc. for a grant of a
Pioneer's Preference for its Electronic Tracking Service
File# PP-23, RM-7784

Dear Ms. Searcy:

As Chief of Police of the Irvine, California Police Department, I
submit the following comments for your review as you consider
ProNet, Inc.'s request for a Pioneer's Preference.

The Irvine Police Department is one of 26 law enforcement agencies
located in Orange County, California. This is a large metropolitan
area with a service population in excess of 2.5 million. There has
been a long-standing tradition of cooperation among these agencies
in addressing crime problems.

As a member of the Orange County Chiefs' and Sheriff's Association,
I feel that the technology of the Electronic Tracking System is
extremely useful to our goal of reducing robberies and associated
crimes of violence. This is one of the most sophisticated crime
reduction technologies available to law enforcement in this area.

I am familiar with ProNet's request and its Petition for Rulemaking
to provide permanent spectrum in the 216-220 MHz band for ETS to
operate under the Business Radio Service rules and I fully support
this request. The ETS has become an integral tool for law
enforcement agencies in Orange County and we rely upon this
technology, particularly as it relates to the apprehension of armed
robbers. Loss of this valuable service would, in my judgment, be
detrimental to our goal of reducing the incidents of violent crime
in our communities.

Sincerely,

CHARLES S. BROBECK
Chief of Police

CSB:JB:ct



DEPARTMENT OF
POLICE

CITY OF SACRAMENTO
CALIFORNIA

HALL OF JUSTICE
813 SIXTH STREET
SACRAMENTO, CA
95814-2495

916-449-5121

JOHN P. KEARNS
CHIEF OF POLICE

February 21, 1992

Ref: 0292-8

Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20036

Re: In matter of a request by ProNet Inc. for grant of a Pioneer's Preference for
its Electronic Tracking Service

File # PP-23, RM-7784

Dear Ms. Searcy:

The Sacramento Police Department is responsible for law enforcement in City of Sacramento encompasses approximately 92 square miles with a population over 360,000. The City's population inflates to over 500,000 during business hours. The department has 620 sworn and 305 non sworn career employees. Like all large metropolitan areas, Sacramento experiences a high crime rate in major felonies including robbery. In 1991, there were 674 commercial robberies and 52 bank robberies in the City.

Since 1986, the Sacramento Police Department, in conjunction with local financial institutions, other businesses and ProNet, deploys Electronic Tracking System (ETS) devices to apprehend robbers. The devices are harder to detect by criminals in comparison with other devices such as dye packs. They aid law enforcement in quick, safe apprehensions of robbers. In 1991, sixteen robberies in the City involved the devices. Four robberies, 25%, resulted in an immediate arrest and the total recovery of stolen property.

February 21, 1992

The department has been pleased with the ETS devices. In addition to the devices controlled by ProNet, we have contracted with ProNet and now lease eleven. The department places the devices in businesses that are unable to afford the devices and those which are not normally primary robbery targets.

We are familiar with ProNet's Request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 Mhz band for ETS, and to authorize ETS to operate under the Business Radio Service rules. We fully support this request.

The Sacramento Police Department continually looks at technological advances in equipment to assist us. Our goal is to use the most effective equipment available to apprehend criminals while minimizing the risk of injury to officers and citizens.

The average crime rate for robberies in the City between 1981 and 1991 shows a decline since establishing the program. The average crime rate for robberies between 1987 and 1991 was 512.5 crimes per 100,000 population. The average crime rate between 1981 and 1986 was 590.7. This reflects a 13.2% drop in robbery crime rates. While not all the credit can go to the ETS devices, it has had a positive impact. Commercial robberies tend to be performed in series. Removing such criminals from the streets through using ETS devices favorably impact crime rates.

We have found that ProNet has provided law enforcement the most current and innovative technology to combat commercial robberies. The ETS devices have proven to be an invaluable tool for the Sacramento Police Department and the business community.

Chief John P. Kearns is aware of the ProNet Inc. petition to the FCC asking for an amendment to Part 90 of the Commission's Rules to establish ETS as a permanent service under the Business Radio Service. Law enforcement needs sophisticated security equipment such as the ETS devices if it hopes to maintain the upper hand on the criminal element.

I strongly support that you grant ProNet Inc. the permanent status. This will allow us to provide the best protection available to our community.

Sincerely,



LEE C. DOHM, DEPUTY CHIEF
OFFICE OF ADMINISTRATIVE SERVICES

LCD:rec



City of University Park

February 21, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

Reference: In the matter of a request by ProNet Inc. for
grant of a Pioneer's Preference for its Electronic Tracking
Service

File # PP-23,RM-7784

Dear Ms. Searcy:

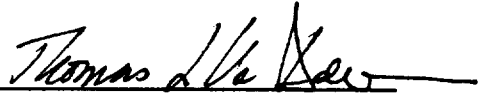
The University Park Police Department hereby submits its
Comments in support of the above referenced Request for a
Pioneer's Preference filed by ProNet Inc.

1. The University Park Police Department is a municipal law enforcement unit providing protective services to a community of 23,000 residents in Dallas County, Texas.
2. The University Park Police Department has had a working relationship with ProNet's Electronic Tracking System since August, 1987. During the past 5 years the University Park Police Department has utilized this service in the apprehension and conviction of serious felonies. In felonies in which Electronic Tracking System equipment was utilized we have experienced over a 90% apprehension rate and a 100% conviction rate. The Department believes this service to be an essential and valuable tool to local public safety.
3. We are familiar with ProNet's Request and its Petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service rules and we fully support this request.

Petition for Pioneer Preference
ProNet, Inc.
File # PP-23, RM-7784
Page 2

4. The University Park Police Department supports the grant of a Pioneer's Preference (and Rulemaking) to ProNet because:
- a. The Electronic Tracking System is critical to local law enforcement in the area of apprehension of serious criminals.
 - b. The Electronic Tracking System by its success rate offers a significant deterrence to serious crime.
 - c. The Electronic Tracking System is the only system of its kind to be offered in this area and has been an innovator of technology in the law enforcement area.
 - d. If ProNet, Inc. is not provided a permanent spectrum and is not provided a Pioneer's Preference for its ETS system, the University Park Police Department feels that a valuable tool against serious crime will be lost in this community.

Sincerely,


Thomas L. Van Doren
Assistant Chief of Police
University Park Police Department

U.S. Department of Justice



Federal Bureau of Investigation

In Reply, Please Refer to
File No. 91-PD-31967

Post Office Box 709
Portland, Oregon 97207
February 27, 1992

Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20036

Attention: Donna Searcy
Office of the Secretary

RECEIVED
FEB 27 1992
FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF THE
SECRETARY
STAMP

Re: In the Matter of Par 90 of the
Commission's Rules to Provide for the
Use of the 220-222 MHz Band by the
Private Land Mobile Radio Services.

PR DK. NO. 89-552

Dear Sirs,

The Federal Bureau of Investigation (FBI), Portland, Oregon, has been contacted by Electronic Systems Incorporated, (ETSI), based in Dallas, Texas, requesting FBI support for ETSI's application for additional frequency spectrum.

This communication is not in support of ETSI or any other individual company, per se, but instead for whatever improvements or expansions might be made in electronic currency tracking systems currently marketed by ETSI under the name ProNet Tracking Systems.

The Portland Office of the FBI is cognizant that this electronic tracking system has been utilized in cities across the United States, and has resulted in a dramatic increase in the number of apprehensions of bank robbers wherein currency with the tracking device were taken in the robberies.

The State of Oregon continues to rank among the leaders nationally in the incidence of bank robbery, the majority of which have occurred in the Portland Metropolitan area. The Portland FBI, working closely with the Portland Police Bureau (PPB), played a major role in the establishment of an electronic tracking system, and since its inception in 1990 has been directly responsible for the apprehension of several individuals responsible for Portland area bank robberies.

FEDERAL COMMUNICATIONS COMMISSION

The Portland FBI supports ETSI's application for frequency band expansion insofar as such expansion would facilitate expanded use of the currency tracking system in robbery and/or extortion applications.

Sincerely,

A handwritten signature in black ink, appearing to read "Robin L. Montgomery", with a stylized flourish at the end.

ROBIN L. MONTGOMERY
Special Agent in Charge

cc: Electronic Tracking Systems Inc.
600 Data Drive, Suite 100
Plano, Texas 75075

RECEIVED

MAR 2 '92

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE
SECRETARY

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.John Lawrence Bailey FBI Building
700 East Charleston Boulevard
Las Vegas, Nevada 89104
February 27, 1992Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

"STAMP AND RETURN"

Dear Ms. Searcy:

The Federal Bureau of Investigation in Las Vegas, Nevada, has had contact with the ProNet System for several years. During the years, the Las Vegas Division has dealt with the ProNet System in regards to bank robbery. The arrest rate of subjects committing robberies has increased with the use of the ProNet System and the repeat of robberies by the same individual has been reduced greatly.

The Electronic Tracking Service is an excellent system in assisting law enforcement agencies and is unique. The advancement of the technology regarding the Electronic Tracking Service will enhance the system as already witnessed in the new design.

Sincerely yours,

EDWARD J. JENKINS
Acting Special Agent in ChargeBy:
RICHARD E. WHITAKER
Supervisory Special Agent

U.S. Department of Justice



Federal Bureau of Investigation

In Reply, Please Refer to
File No.

2635 Century Pkwy NE, Suite. 400
Atlanta, Georgia 30345
February 24, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M. Street, N.W., Room 222
Washington, D.C. 20036

Reference: In the matter of a request by ProNet Inc. for grant
of a Pioneer's Preference for its Electronic
Tracking Service

File # PP-23, RM-7784

Dear Ms. Searcy:

The Federal Bureau of Investigation (FBI), Atlanta, Violent Crimes Major Offender Squad, hereby submits its Comments in support of the above referenced Request for a Pioneer's Preference filed by ProNet Incorporated.

The Violent Crimes Major Offender Squad in the Atlanta Office of the FBI represents the squad which deals primarily with violations of the Federal Bank Robbery Statute. I am the supervisor of this squad and began a relationship with ProNet, Incorporated, in early 1991 when Mike E. Markwood of ProNet, Incorporated, gave a demonstration presentation of the ProNet Tracking System and its effects on the bank robbery problem. Subsequent to this demonstration, I contacted my contemporaries, that is, other FBI supervisors in charge of bank robbery squads in several other cities, and was informed by them that the installation of the ProNet Tracking System resulted in a drastic reduction of bank robbery violations in the territories in which the system was installed. In many cases bank robberies were cut in half which is an astounding accomplishment. Efforts are currently on the way with my full support for ProNet to sell to the banking community in the Atlanta, Georgia, area. With this tracking system, it will enable the quick apprehension of violators of the Bank Robbery Statute.

I am familiar with ProNet's request in this petition for Rulemaking to provide permanent spectrum in the 216-220 MHz band for ETS, and to authorize ETS to operate under the Business Radio Service rules and the FBI in Atlanta, Georgia is fully in support of this request. The FBI in Atlanta, Georgia, supports the grant of a Pioneer Preference (and Rulemaking) to ProNet because:

a. This law enforcement tool has proven to be very successful in removing violent criminals (those engaged in bank robbery activities) from the streets.

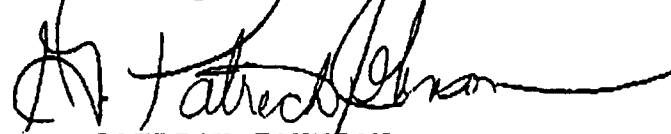
b. Currently the Atlanta Office of the FBI has no data available inasmuch as the ProNet system has not been installed in the Atlanta area as of this writing; however, in conversation with my contemporaries in Phoenix, San Francisco, and other cities, it is obvious that this system is instrumental in a vast increase of apprehension and conviction rates for those individuals engaged in bank robbery activities.

c. Electronic Tracking System as described by Mike Markwood and installed in other cities, is a unique and innovative technology that does not currently exist. Currently the method of attempting to track bank robbers subsequent to the bank robbery is a tear gas and dye pack that explodes some few seconds after it is removed from the bank property. This is a valuable tool; however, it loses its effectiveness within fifteen to twenty seconds, therefore, if a policeman is not within visual sight of the explosion, it does little or no good, other than to dye the money which is then subsequently attempted to be traced. The attempts to trace dyed money, although sometimes successful, are very often fruitless due to the many hands the money may have passed through prior to the time it is returned or reported to the FBI.

d. Finally, I would like to point out that bank robberies in the Atlanta, Georgia, area have more than doubled within the past year. Within the past year we have only been utilizing the technology of a dye pack system which has obviously have proven effective. The proper method to solve multiple bank robberies by the same individual is through the Electronic

Tracking System. It is felt that an individual who currently commits between five and fifteen robberies would be apprehended shortly after the first robbery, thus reducing greatly the number of offenses in the potential for injury to innocent individuals.

Sincerely,

A handwritten signature in dark ink, appearing to read "G. Patrick Johnson", written over a circular stamp or mark.

G. PATRICK JOHNSON
Supervisor, Violent Crimes
Major Offender Squad
Atlanta, Georgia

3*



U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 91-PD-31967

Post Office Box 709
Portland, Oregon 97207
February 27, 1992

Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20036

Attention: Donna Searcy
Office of the Secretary

Re: In the Matter of Par 90 of the
Commission's Rules to Provide for the
Use of the 220-222 MHz Band by the
Private Land Mobile Radio Services.

PR DK. NO. 89-552

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FEDERAL COMMUNICATIONS COMMISSION

The Portland FBI supports ETSI's application for frequency band expansion insofar as such expansion would facilitate expanded use of the currency tracking system in robbery and/or extortion applications.

Sincerely,



ROBIN L. MONTGOMERY
Special Agent in Charge

✓cc: Electronic Tracking Systems Inc.
600 Data Drive, Suite 100
Plano, Texas 75075

ProNet TRACKING SYSTEM SPECIFICATIONS

<u>TRANSMITTER</u>		
<u>PARAMETER</u>	<u>TYPE/VALUE</u>	<u>UNITS</u>
RF Frequency Range	200-400 (VHF, UHF)	MHz
RF Stability	+/- .0005% (UHF) +/- .001% (VHF)	
Modulation Bandwidth Spurs & Harmonics	> 30 dB @ 40 kHz from carrier > 30 dB below assigned carrier	
Modulation Type Rate	50% AM modulated Square Wave 90 Hz	
RF Power Output	100	mW, Peak
Emission Designators	80KOPON, 80KOAON, 80KOP2D, 80KOA2D	
<u>RECEIVER</u>		
Sensitivity	-134	dBm
Bandwidth	+/- 4	KHz
RF Stability	+/- .0005%	
RF Selectivity	+/- 1	MHz
Adjacent Channel Selectivity	30 KHz Ch.	
Dynamic Range	100	dB

D

Electronic Tracking Service ("ETS"). A low-power radiolocation service assisting law enforcement agencies, security organizations, and commercial entities in tracking the location of property and individuals.

E

Channel 13 TV Interference Test

<u>Type Set</u>	<u>Year</u>	<u>Range for No Interference</u>
JVC - 19"	92	< 1 FT
JVC - 27"	92	< 3 FT
DAYTRON - 19"	80	< 27 FT
MAGNAVOX - 19"	85	< 20 FT
ZENTH - 19"	85	< 25 FT
PANASONIC - 12"	85	< 25 FT
BLK & WHT - 10"	80	< 30 FT

The above test were conducted with a 100 mW, 216.8 MHz PTS Beacon with external rabbit ear antennas on the TV sets which were tuned for weak signal reception of Ch 13. In all cases, the range is the distance from the TV at which no observable interference occurred.

These measurements were made in Dallas at nominal ranges of 40 miles from the Ch 13 TV tower.

In bench tests, the effective power output of the Tag Signal which causes noticeable video interference to a TV set at 214 MHz is -75 dBm. For a typical TV sensitivity of -95 dBm, the total pathloss required to prevent this type of interference is 20 dB. This correlates to approximately one wavelength away from the TV which would be 4.5 feet.

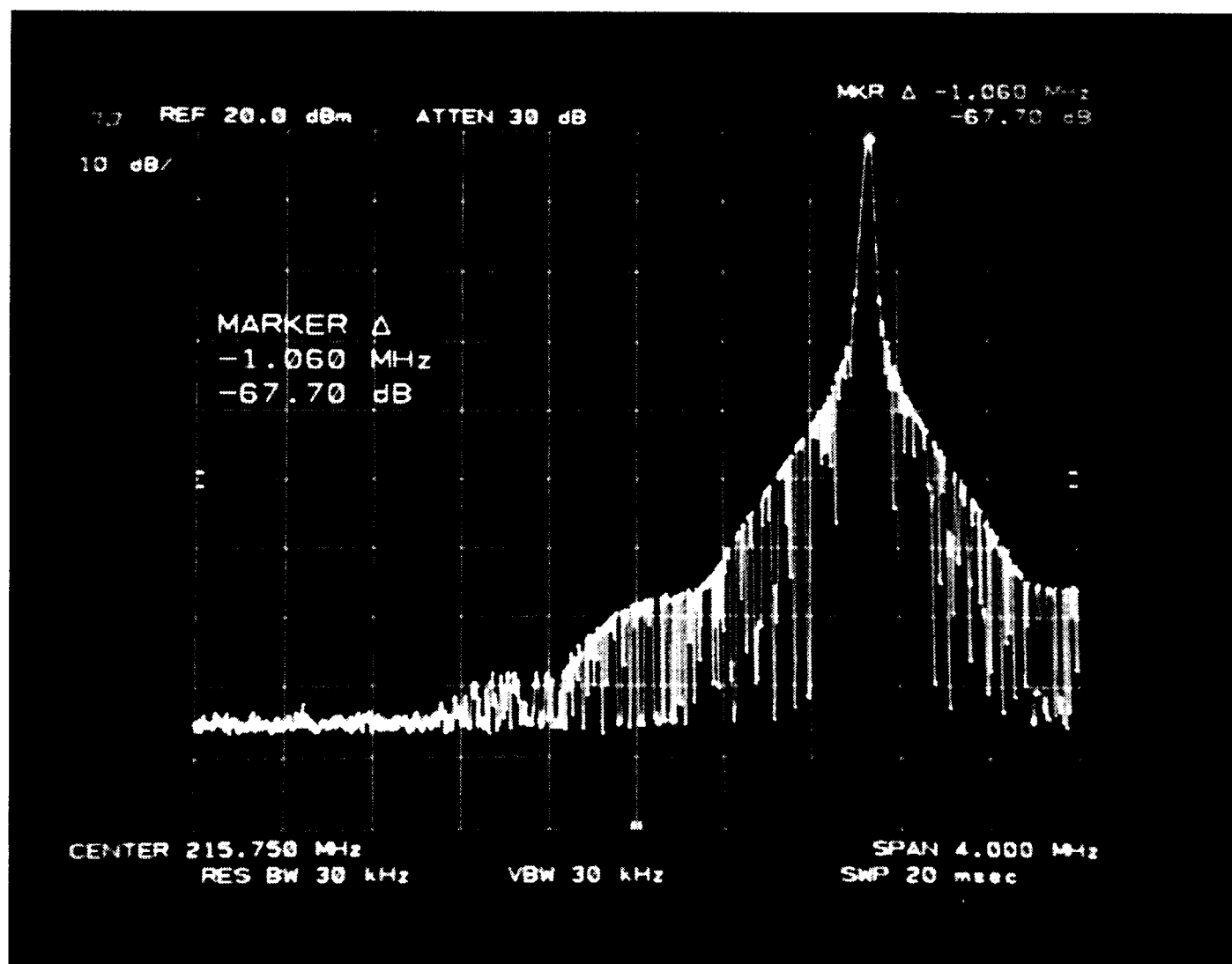
The interference caused by the peak power from a PTS beacon is shown in the PTS Tag Spectrum (see figure 2). The interference generated by the tag is -48 dBm at the sound carrier frequency. The required path loss to prevent interference would be the difference between a typical TV's receiver sensitivity (-95dBm) and the interfering signal level of -48 dBm. Therefore, the isolation or path loss needed to prevent interference is 47 dB. The PTS beacon has a -10 dB gain antenna which means that we would need an additional path loss of 37 dB. To achieve the additional 37 dB of path loss, a distance of 25 feet is required between the beacon and the TV receiver.

Summary Table Based On Peak Spectrum Levels (30 KHz BW)

Interference Level at Ch-13 Sound Carrier	=	-48 dBm
Typical TV Receiver Sensitivity	=	<u>-95 dBm</u>
Required Path Loss For No Interference	=	-47 dB
Less PTS Tag Antenna Loss	=	<u>-10 dB</u>
Adjusted Path Loss For No Interference	=	-37 dB
Equivlent Distance (Wavelengths/Feet)	=	5.6/25 ft

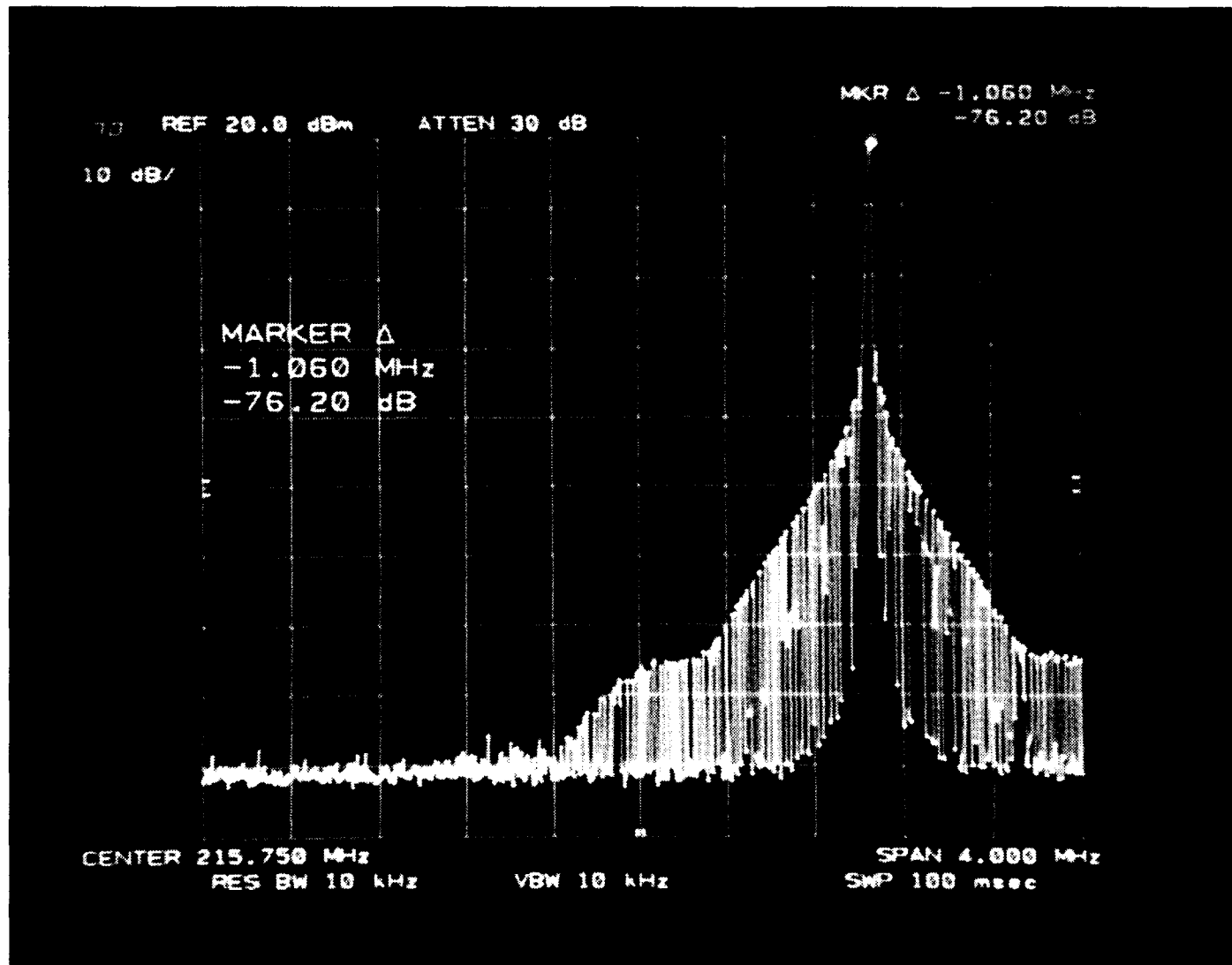
Average power levels are typically 20 db below peak levels

PTS TAG SPECTRUM (216.8 MHz, 90 Hz MODULATION)
PEAK LEVELS MEASURED IN A 30 kHz BAND WIDTH



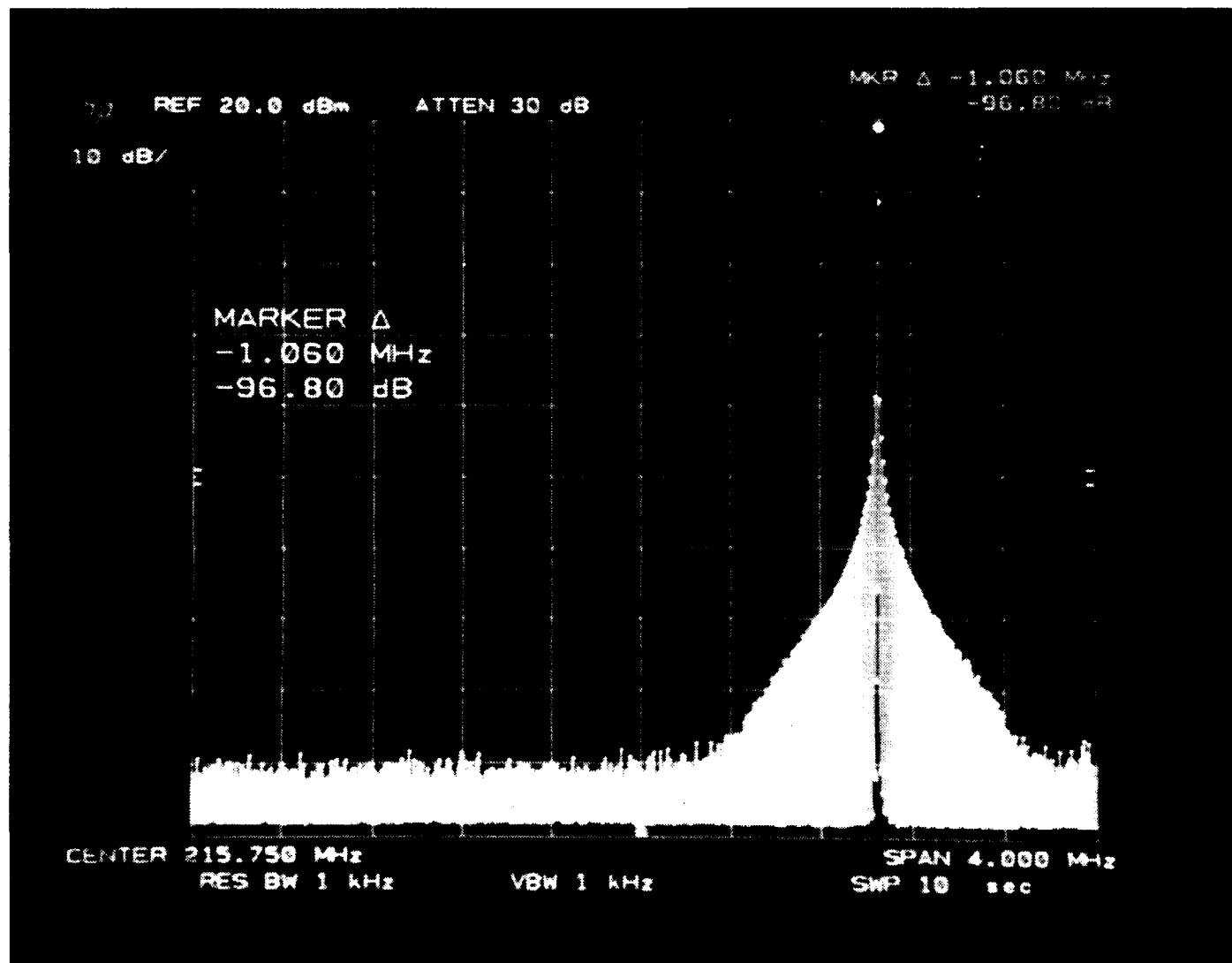
CENTER FREQUENCY = CH-13 SOUND CARRIER
PEAK LEVEL = 67.7 DBC

PTS TAG SPECTRUM (216.8 MHz, 90 Hz MODULATION)
PEAK LEVELS MEASURED IN A 10 kHz BAND WIDTH



CENTER FREQUENCY = CH-13 SOUND CARRIER
PEAK LEVEL = 76.2 DBC

PTS TAG SPECTRUM (216.8 MHz, 90 Hz MODULATION)
PEAK LEVELS MEASURED IN A 1 kHz BAND WIDTH



CENTER FREQUENCY = CH-13 SOUND CARRIER
PEAK LEVEL = 96.8 DBC

Channel 13 De-Sense Levels For Ground Trackers (*)

(De-Sense Level IN db) / [% of Available Tracking Range]

	<i>----- Distance from Ch-13 (Miles) -----</i>		
<u>PTS Frequency</u>	<u>0 -> 5</u>	<u>5 -> 10</u>	<u>-> 10</u>
219.96 MHz	(10) / [72%]	(0) / [100%]	(0) / [100%]
216.80 MHz	(12) / [64%]	(0) / [100%]	(0) / [100%]
216.40 MHz	(15) / [58%]	(1) / [99%]	(0) / [100%]

(*) Based on a nominal receiver sensitivity of -130 dBm

Channel 13 De-Sense Levels For Remotes & Helicopters (*)

(De-Sense Level in db) / [% of Available Tracking Range]

	<i>----- Distance from Ch-13 (Miles) -----</i>		
<u>PTS Frequency</u>	<u>0 -> 5</u>	<u>5 -> 10</u>	<u>-> 10</u>
219.96 MHz	(17) / [52%]	(11) / [70%]	(5) / [85%]
216.80 MHz	(20) / [48%]	(14) / [62%]	(8) / [78%]
216.40 MHz	(21) / [45%]	(14) / [62%]	(9) / [75%]

(*) Based on a nominal receiver sensitivity of -130 dBm

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Request to Modify Petition for Rule Making will be delivered by hand to the following parties on the 27th day of October, 1993:

Beverly G. Baker
Deputy Chief, Private Radio Bureau
Federal Communications Commission
2025 M Street, Room 5002
Washington, D.C. 20554

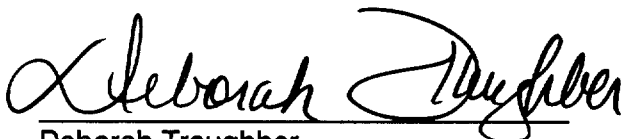
George R. Dillon
Chief, Aviation and Marine Branch
Private Radio Bureau
Federal Communications Commission
2025 M Street, Room 5114
Washington, D.C. 20554

David R. Siddall
Chief, Frequency Allocation Branch
Office of Engineering and Technology
Federal Communications Commission
2025 M Street, Room 7102
Washington, D.C. 20554

Julian L. Shepard, Esq.
Association for Maximum Service
Television, Inc.
1400 16th Street, N.W., Suite 610
Washington, D.C. 20036

Peter Tannenwald, Esq.
Arent Fox Kintner Plotkin & Kahn
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Counsel for Phonic Ear, Inc.

Martin Bercovici, Esq.
Keller and Heckman
1001 G Street, N.W., Suite 500W
Washington, D.C. 20001
Counsel for Waterway Communications System, Inc.



Deborah Traugher
158783/3

October 26, 1993